

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ABHIJIT DAS

No. 21-cr-10200-RGS

ASSENTED-TO MOTION TO CONTINUE SURRENDER DATE

Defendant Abhijit Das, with the assent of the government, respectfully requests to continue his surrender date for 90 days, through and including April 21, 2025.

As grounds for this motion, at the sentencing hearing, this Court had indicated it would evaluate a request for a stay of surrender pending appeal once the Court has a “chance to read what the substance of the appeal is and what the Government has to say in response.” 7/18/24 Tr. at 24. However, appellate counsel (Jack Pirozzolo of Sidley Austin LLP) is not yet able to make that presentation to the Court because the trial transcripts are not yet complete. In addition, the second case before Judge Angel Kelley, No. 23-cr-10160, remains pending and continued release will facilitate trial preparation by undersigned counsel, who represent Mr. Das in that case.

Respectfully submitted,

ABHIJIT DAS

by his attorneys,

/s/ William Fick

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Certificate of Service

I hereby certify that this document and any attachments filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 6, 2025.

/s/ William Fick